

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

JENAI HAYES,)	
DR. LILY MORENO LEFFLER,)	
)	
and)	
)	
DR. JAMES BAILEY,)	No. 3:20-cv-01023 (<u>LEAD CASE</u>)
DR. PIPPA MERIWEATHER, and)	
DR. DAMON CATHEY,)	(CONSOLIDATED)
)	
Plaintiffs,)	Judge Trauger
)	
v.)	Magistrate Judge Holmes
)	
METROPOLITAN GOVERNMENT)	JURY DEMAND (6)
OF NASHVILLE AND DAVIDSON)	
COUNTY, TENNESSEE,)	
)	
Defendant.)	

PLAINTIFFS' EXHIBIT LIST

Pursuant to Rule 26(a)(3) and this Court's Order Setting Case for Trial [D.E. 247], Plaintiffs hereby give notice that they may use the following documents or things as exhibits at trial:

	<u>Title:</u>	<u>Bates Number:</u>
1	January 2020 District Organizational Chart	MG_001057
2	July 2020 District Organizational Chart	MG_001058
3	July 2020 District Organizational Chart	Plaintiffs_000320
4	March 2021 District Organizational Chart	N/A
5	Dept. of School Support Chart	Plaintiffs_000368
6	Meriwether CV	MG_002792-793

7	Cathey Resume	Plaintiffs_000420-424
8	Jenai Hayes Resume	MG_006825-827
9	Hayes Termination Letter	MG_001059
10	Cathey Termination Letter	Plaintiffs_000446
11	Bailey Termination Letter	Plaintiffs_000119
12	Meriwether Termination Letter	Plaintiffs_000372
13	Leffler Termination Letter	Plaintiffs_000086
14	Chris Barnes	(Audio File)
15	James Bailey HR Conversation	(Audio File)
16	Meriwether Barnes Termination	(Audio File)
17	Lisa Spencer 1	(Audio File)
18	Lisa Spencer 2	(Audio File)
19	Tammy	(Audio File)
20	5/19/20 School Board Agenda	N/A
21	5/26/20 School Board Agenda	MG_000167-182
22	Central Office Reorganizational Plan	MG_000181
23	6/10/20 Reorganization Announcement	SchoolsEmails_0073546-548
24	8/11/20 School Board Agenda	Plaintiffs_000001-52
25	5/8/17 Cathey Promotion Letter	N/A
26	Cathey Experience and Pay	SchoolsEmails_0005803
27	Carlton Battle Hearing Transcript	MG_003046-462
28	Carlton Battle Hearing Exhibits	MG_008657-723
29	Carlton Battle Investigation File	MG_003758-856

30	Principal List	SchoolsEmails_0013715–720
31	Graduation Rates (2018 -2019)	Plaintiffs_001439-440
32	Staff Record James Bailey	N/A
33	4/3/20 Principals and Exec. Directors - Interim and Vacancies	SchoolsEmails_0068172–177
34	February 2020 Office of Innovation Updates	SchoolsEmails_0007686–687
35	6/11/20 Keri Barlett and Sean Braisted Email Press Release Info	SchoolsEmails_0080585–592
36	7/23/19 Email from Pinkston to Battle asking for weekly updates	SchoolsEmails_0001745–756
37	Lisa Coons texts	N/A
38	5/6/20 Renita Perry Recommendation Letter for Dr. Bailey	Plaintiffs_000121
39	2/2/20 Meeting for Principal Discussion	SchoolsEmails_0005291–292
40	5/4/20 Battle Letter to Bailey	SchoolsEmails_0012849
41	6/18/20 email interview re: rescheduling at McGavock	SchoolsEmails_0011978–979
42	6/16/20 Email from Perry to Spencer	SchoolsEmails_0011517
43	6/14/20 Emails re: Bailey McGavock Interview	SchoolsEmails_0012010
44	6/15/20 Emails re: Bailey McGavock Interview	SchoolsEmails_0014122
45	6/15/20 McGavock Principal Schedule	SchoolsEmails_0012978
46	6/23/20 Bailey response to Lisa Spencer interview	SchoolsEmails_0012846
47	6/19/20 Lisa Spencer response to Bailey re: interview	SchoolsEmails_0012846
48	Bailey Formal Complaint	Plaintiffs_000174–176
49	Spreadsheet re: Schools	(Excel Doc)

50	Schools of Innovation Tiering	N/A
51	MNPS Priority Schools 2012-2021	MG_006820
52	Priority School List	MG_006821
53	7/30/19 School Accountability Status List	(Excel Spreadsheet)
54	Priority Schools	(Excel Spreadsheet)
55	School Accountability Status List	N/A
56	Clusters Reimagined	SchoolsEmails_00086814
57	Priority School Since 2012	N/A
58	List of Schools	SchoolsEmails_0086412
59	June 30 Budget (whole)	MG_000694-731
60	May 19 Budget (whole)	MG_000654-693
61	MNPS Vacancies by Function 6 - 2020	(Excel Spreadsheet)
62	2/11/22 Board Presentation	SchoolsEmails_0025587-613
63	4/19/19 Budget	Plaintiffs_000642-689
64	2/17/20 Budget	SchoolsEmails_0003664-693
65	3/23/20 Budget	MG_000574-613
66	4/28/20 Budget	MG_000614-653
67	5/19/20 Budget	MG_000654-667
68	6/30/20 Budget	MG_000694-707
69	6/19/20 Vacancies	SchoolsEmails_0006432
70	Vacancies by Function Email	Plaintiffs_001306-310
71	Hank Clay Email RE Reductions	SchoolsEmails_0001614
72	1/25/21 Penny Schwinn Budget Letter	Plaintiffs_000113-115

73	FY 21-22 Focused Investments Budget Presentation	Plaintiffs_000063–093
74	2/13/20 Inside MNPS Budget Newsletter	SchoolsEmails_0086840–846
75	6/17/20 Press Statement about Budget email	SchoolsEmails_0002146–147
76	Positions and Budgeted Salary Amounts Chart	MG_001350
77	ESSER Funds	SchoolsEmails_0000615–667
78	ESSER Chart	(Excel Spreadsheet)
79	5/5/20 Mark North Questionnaire	SchoolsEmails_0001942–946
80	5/5/20 Mark North Email	SchoolsEmails_0001501–504
81	11/6/21 Metro’s Responses to First ROGs	N/A
82	10/22/21 Metro’s Response to Plaintiff Leffler’s First ROGs (1)	N/A
83	11/24/21 Metro’s Response to Plaintiff Leffler’s First ROGs	N/A
84	11/24/21 Metro’s First Supplemental Responses to Leffler’s First ROGs	N/A
85	11/24/21 Battle’s Response to Bailey, Meriwether and Cathey’s First ROGs	N/A
86	11/24/21 Bailey v. Metro - Metro’s Responses to First ROGs	N/A
87	EEOC Position Statement – Leffler	N/A
88	EEOC Position Statement – Hayes	N/A
89	EEOC Position Statement – Cathey	MG_008311–314
90	EEOC Position Statement – Bailey	N/A
91	Hayes Evaluations (2018 – 2019)	MG_000024–029
92	Bailey Evaluations (2012 – 2020)	N/A

93	Meriwether Evaluation (2014 – 2015)	MG_002800–804
94	Meriwether Evaluation (2017 – 2018)	MG_002778–783
95	Meriwether Evaluation – Instructional Supervisor Evaluation Rubric	MG_002762–777
96	Leffler Evaluation	Plaintiffs_000344–359
97	Leffler Evaluation – Instructional Supervisor Evaluation Rubric	MG_005153–167
98	Cathey Evaluations (2017 – 2018)	Plaintiffs_000434–440
99	Cathey Evaluation – Instructional Supervisor Evaluation Rubric	MG_002321–336
100	12/18/20 Damon Cathey Video	(Video File)
101	6/10/20 Offer Letters	Plaintiffs_000644–660
102	6/10/20 Executive Directors (2020 – 2021)	Plaintiffs_00293–296
103	6/5/20 Blog post	SchoolsEmails_0081780
104	Shawn Lawrence Resume	MG_001956–958
105	Chad High Resume	MG_001928
106	Michelle Maultsby-Springer Resume	MG_001973–974
107	ED Names and DOB	(Excel Spreadsheet)
108	19-20 to 20-21 List of ED	N/A
109	MNPS Information September 21/2020 Leffler #2	N/A
110	ED Names, Salary, and Ages	MG_001351
111	Interview Chart	N/A
112	Scores for ED	(Excel Spreadsheet)
113	Executive Director of Schools Interview Scores	(Excel Spreadsheet)

114	5/19/20 James Witty Emails	SchoolsEmails_0069436-437
115	6/24/20 Leffler Text re: Call with David Williams	Plaintiffs_000578-579
116	5/21/20 Gibbs and Barnes Interview Email	N/A
117	Chart from ED texts	SchoolsEmail_0068165-166
118	8/13/20 Williams / Cathey Text Messages	N/A
119	Tweet Re-org 1	N/A
120	5/27/20 Text to Interview Chad High	N/A
121	6/3/20 Email Re: Chad High Interview	SchoolsEmails_0013303
122	5 Dates of ED Interviews	(Excel Spreadsheet)
123	Executive Director 2020 Candidate List	MG_001478
124	5/19/20 Emails RE: Interviews + Calendar Appointments	Plaintiffs_000457-484
125	Executive Director Candidates	MG_001479
126	5/18/20 Pippa Meriwether ED Interview Invitation	SchoolsEmails_0005853
127	5/18/20 Damon Cathey ED Interview Invitation	SchoolsEmails_0005096
128	6/1/20 Emails between Felicia Everson-Tuggle and Lisa Spencer	SchoolsEmails_0013286-288
129	6/18/20 Read Receipt - Email Re: Records Request	Plaintiffs_000494
130	7/27/20 Records Request Emails	Plaintiffs_000486-493
131	7/17/20 Barnes/Reid Email	SchoolsEmails_0069116-124
132	Lovgren Expert Report	(D.E. 190-12)
133	Robin Lovgren Curriculum Vitae	N/A
134	Smith Expert Report	(D.E. 191-4)
135	TCRS Information Sheet	N/A

136	Reorg Summary	Plaintiffs_000717-719
137	Baum Updated Expert Report – Bailey	N/A
138	Baum Updated Expert Report – Cathey	N/A
139	Baum Updated Expert Report – Doe (Hayes)	N/A
140	Baum Updated Expert Report – Leffler	N/A
141	Baum Updated Expert Report – Meriweather	N/A
142	Vital Statistics Males 2018	N/A
143	Vital Statistics Males 2019	N/A
144	Vital Statistics Males 2020	N/A
145	Vital Statistics Females 2018	N/A
146	Vital Statistics Females 2019	N/A
147	Vital Statistics Females 2020	N/A
148	Bailey 2019 W-2	Plaintiffs_000849
149	Bailey 2020 W-2 Metro	Plaintiffs_000850
150	Bailey 2020 W-2	Plaintiffs_000851
151	Bailey 2022 W-2	Plaintiffs_000852
152	Bailey 2024 W-2	Plaintiffs_001287
153	Cathey 2022 W-2	Plaintiffs_000910
154	Cathey 2023 W-2	Plaintiffs_000909
155	Cathey 2024 W-2	Plaintiffs_001283
156	Hayes 2021 W-2	Plaintiffs_000871
157	Hayes 2022 W-2	Plaintiffs_000872
158	Hayes 2023 W-2	Plaintiffs_000873

159	Leffler 1099-NEC 2024	Plaintiffs_001286
160	Leffler 2024 W-2 Metro	Plaintiffs_001285
161	Leffler 2024 W-2 TSU	Plaintiffs_001284
162	Meriwether W-2 2024 Metro	Plaintiffs_001299
163	Meriwether 2024 W-2 Belmont	Plaintiffs_001301
164	Meriwether 1099-R 2024	Plaintiffs_001300
165	Willie Lynch Assignment	Plaintiffs_000274–279
166	Willie Lynch Letter	N/A
167	8/8/19 FERPA Permission Form	N/A
168	2/4/20 Texts with Susan Blankenship	N/A
169	2/7/20 A. Herman Reprimand Letter	MG_000986
170	2/8/20 Emails Between Hayes and Cochrane	Plaintiffs_000705–711
171	2/11/20 Jenai Hayes HR Emails	N/A
172	2/12/20 Critical Mention Emails (Whole)	SchoolsEmails_0026966–706
173	2/17/20 Critical Mention Excerpts	SchoolsEmails_0026671–700
174	4/4/20 Email from Hayes to Blankenship re “Lets make a Slave” Assignment	Plaintiffs_000723–724
175	5/7/20 Email from Ryan Latimer to Chris Barnes	SchoolsEmails_0069408
176	6/20/20 Text to Antionette Williams	N/A
177	10/10/20 text from Pertiller to Hayes 1/2	N/A
178	10/10/20 text from Pertiller to Hayes 2/2	Plaintiffs_000575
179	CNN Article: “Student-teacher in Tennessee dismissed over Black History Month assignment on slavery	N/A

180	NBC News Article: “A Nashville student-teacher was dismissed over a lesson on slavery the school says was not age appropriate.”	N/A
181	WKRN Article: “Parents demand answers over 4th grade “LET’S MAKE A SLAVE” assignment”	N/A
182	5/18/20 Tammy Lee Email re: Firefly	N/A
183	Firefly Contract – Final	Plaintiffs_00215–224
184	Firefly Attachment C Cost	Plaintiffs_000225–227
185	5/8/17 MNPS new promotion letter to Meriwether	MG_002886
186	6/21/20 Meriweather Formal Complaint of hostile work environment and retaliation	N/A
187	7/1/2020 Letter from Meriwether to Metro	SchoolsEmails_0006342–345
188	7/1/2020 Email from Meriwether to David Sevier Concern letter	SchoolsEmails_0000361–377
189	7/15/2020 Christopher Barnes response to “Concern” letter	SchoolsEmails_00690–076
190	7/1/2020 Email from Meriwether to Mary Zander forwarded to Christopher Barnes	SchoolsEmails_0067862
191	2015 MNPS Employee Support Handbook	N/A
192	Guidance for Non-Renewal (2020 – 2021)	N/A
193	Disciplinary Policy	N/A
194	Board Policy Recruitment	MG_001053
195	Assignment Transfer Policy	MG_001055
196	Annual Operating Budget (D.E. 192-9)	N/A
197	<i>Swindall v. Braden</i> – Complaint	N/A
198	<i>McGruder v. Metro Nashville</i> – Verdict Form	N/A

199	<i>McGruder v. Metro Nashville</i> – Judgment	N/A
200	<i>Jones v. Metro Nashville</i> – Complaint	N/A
201	<i>Garcia v. Metro Nashville</i> – Amended Complaint	N/A
202	<i>Garcia v. Metro Nashville</i> – Stipulation of Dismissal	N/A

Respectfully submitted,

/s/ Ann Buntin Steiner by JFH w/ permission

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CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt as follows: J. Brooks Fox, Benjamin A. Puckett, and Melissa Roberge, Department of Law, Metropolitan Courthouse, Suite 108, P.O. Box 196300, Nashville, Tennessee 37219. Parties may access this filing through the Court's electronic filing system.

/s/ Jesse Ford Harbison

Jesse Ford Harbison